## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY

Master File No. 2:12-MD-02327 MDL 2327

LITIGATION

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ETHICON WAVE 12 CASES LISTED IN EXHIBIT A

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

## NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF JAIME L. SEPULVEDA-TORO, M.D. FOR WAVE 12

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion, memorandum and reply brief filed in relation to Jaime L. Sepulveda-Toro for Ethicon Wave 1, Dkt. 2014 (motion), Dkt. 2018 (memorandum in support) and Dkt. 2225 (reply). Plaintiffs respectfully request that the Court exclude Jaime L. Sepulveda-Toro's testimony, for the reasons expressed in the Wave 1 briefing. This notice applies to the following Wave 12 cases identified in Exhibit A attached hereto.

Dated: October 29, 2019 Respectfully submitted,

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## **EXHIBIT A**

Alford, Doris	2:13-cv-14009
Burris, Tina	2:14-cv-24320
Carbon, Ediany	2:12-cv-04269
Cayer, Diane	2:12-cv-09976
Coker, Mary	2:15-cv-11324
Cooper, Janis M.	2:12-cv-06593
Ellerbee, Ovis	2:15-cv-08276
Ferrer, Brooke	2:12-cv-04591
Graham, Tammy	2:12-cv-06054
Hunt, Barbara	2:17-cv-02945
Jackson, Doris Chappell	2:12-cv-00265
Kinard, Deborah	2:13-cv-09247
Kirby, Sherry	2:16-cv-00238
Longoria, Delores	2:13-cv-00129
McGathey, Elizabeth	2:12-cv-01538
Nugnes, Darleen	2:14-cv-24207
Perrywinkle, Rayne	2:13-cv-28452
Pitlyk, Denise	2:14-cv-31208
Raney, Kimberly	2:13-cv-10010
Shea-Towers, Deborah	2:13-cv-01540
Smith, Barbara D.	2:13-cv-20902
Tedder, Judy L.	2:13-cv-00097
Thomson-Roy, Jeannae M.	2:12-cv-04586

## **CERTIFICATE OF SERVICE**

I hereby certify that on October 29, 2019, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett

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